Norman H. Bangerter
Governor
Dee C. Hansen
Executive Director
Dianne R. Nielson, Ph.D.
Division Director

State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

355 West North Temple
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203
801-538-5340

November 22, 1991

Mr. Larry A. Drew, Manager
Environmental Affairs
Hecla Mining Company
6500 Mineral Drive
Coeur d'Alene, Idaho 83814-1931

Dear Mr. Drew:

Re: Status of Permit Amendment Review, Mill Tailings Facility Reclamation Plan, Escalante Silver Mine, M/021/004, Iron County, Utah

On September 13, 1991, the Division received your response to our April 29, 1991, conditional approval letter regarding Hecla Mining Company's (Hecla) Mill Tailings Facility Reclamation Plan. On October 24, 1991, we received a copy of Hecla's October 16, 1991, amended Plan of Operations, from the Beaver River Resource Area, BLM. The plan amendment addresses Hecla's proposed plans for obtaining borrow materials for reclamation of the tailings impoundment from both public and privately held lands.

This letter is sent to notify you that the Division will not be able to complete its technical review of your recent responses within the allotted 30-day time period as provided under R613-4-101.1. We will postpone completing our review of both permitting documents until the BLM notifies us that their Environmental Assessment of the October 16th, amended Plan of Operations is complete.

We will coordinate our review of your latest technical responses with the Bureau of Land Management and the State Division of Water Quality to the extent possible. We hope to complete our review by late early to mid-December, 1991. We apologize for the delay and thank you for your understanding and patience in this regard.

We have also received review comments from the State Division of Water Rights (Dam Safety section), regarding the hydrologic study prepared for the tailing impoundment (comments attached). It is our opinion that their comments, especially items #2 and #3, deserve due consideration. Dam Safety is concerned that the impoundment may become unstable with time, especially if the pond begins to fill up with water. They have also expressed concern that the storm drainage ditches are adequately sized and constructed to prevent erosional damage to the impounding structure.

The State Engineer's Office has the responsibility to assure that long-term integrity of impounding structures is maintained. Therefore, we request that you respond directly to the State Division of Water Rights and provide us with a copy of your response. Mr. Matt Lindon has been our Dam Safety contact in this matter. Please contact me or Holland Shepherd if you have questions regarding the content of this letter.

Sincerely,

D. Wayne Hedberg

D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program

enclosure
jb
cc: Richard Hall, DWR, Dam Safety
Kiran L. Bhayani, DWQ
Arthur L. Tait, BLM, Beaver River RA
Lowell Braxton, DOGM
Minerals staff (1)
M021004.1

Norman H. Bangerter
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Robert L. Morgan
State Engineer

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WATER RIGHTS

1636 West North Temple, Suite 220
Salt Lake City, Utah 84116-3156
801-538-7240

September 18, 1991

Oil Gas & Mining
Attn: Holland Shepherd
3 Triad Center, Suite 350
Salt Lake City, UT 84180-1203

RE: Escalante Tailings Dam (Ranchers Tailing)

Dear Sir:

We have reviewed the hydrology study for the above referenced dam stabilization project. We have the following comments:

1. The 100 year flood appears acceptable from a Dam Safety aspect but what are the effects of a larger storm (up to the PMF) on the routing and drainage system. Will the ditches fail and dump all the storm water to pool on the tailings. We do not count on impermeable blankets to stop all seepage and we would hate to see any storm water seeping through the tailings towards the dam & drains.

2. Will the drains flow freely or will they eventually be capped - forcing any water seeping through the blanket to pond against the dam. If the drains are not capped will the outflow be collected.

3. We would like to see a grade control section built where the ditches bypass the dam on the abutments. This would prevent any backcutting at a critical section where it might influence the dam. We would also like to see how the flows from the interceptor ditches are to be routed down the steep abutment hills to the main channel. The interceptor trench detail depicts the trench on flat ground. What will the configuration of the trench be on the steep hillside. Will the entire trench be cut into the hill or will some of it be diked by fill material. Will the 4:1 slopes catch natural grade at a reasonable distance.

If you have any questions or comments, please call Matt Lindon or Rick Hall in our Dam Safety Section.

Sincerely,

Robert L. Morgan, P.E.
State Engineer

RLM/sh

cc: Larry A. Drew - Hecla Mining Company, Environmental Affairs
Larry Mize - Dept. of Health, Environmental Quality
Gerald Stoker - Cedar City Regional Engineer